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January 18, 2021

Via ECF

Magistrate Judge A. Kathleen Tomlinson United States District Court Eastern District of New York 100 Federal Plaza Central Islip, New York 11722

Re: Doe v. Cuchel

Dkt. No. 2:20-cv-05402

Dear Magistrate Judge Tomlinson:

I am attorney for the defendant, Stephen Cuchel in the captioned matter. On November 6, 2020, plaintiff filed a Motion for a Protective Order and for Leave to Proceed Under a Pseudonym, in which plaintiff's counsel indicated that the defendant has consented to the application. Plaintiff's motion includes a proposed Order granting the requested relief.

The Court has not yet set a schedule for this motion, but in an abundance of caution, I write to advise the court that while the defendant, generally, consents to plaintiff's application for leave to proceed under a pseudonym in this matter, we do not agree with the content of the proposed Order submitted by plaintiff in this regard.

Otherwise, we will await a Scheduling Order from the Court.

Thank you for your consideration.

Very truly yours,

Kevin J. Keating

KEVIN J. KEATING

KK/dg

cc: Lisa D. Haba, Esq.

Farzin Franklin Amanat, Esq.

Attorneys for Plaintiff